IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
ST. JOSEPH DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

1) JOSHUA KEITH BOWERS,
2) SABRENA LYNN MORGAN,
3) ELGIN EUGENE DOTHAGE,
4) FRANKLIN CHARLES CARTER,
5) STEVEN LEE SCHREIER, JR.,
6) RONALD LOUIS ROBERTS,
7) JOSE LUIS RUIZ-SALAZAR,
8) GABRIEL RUIZ-SALAZAR,
9) GREGORY C. BULLOCK,
10) TAYLOR LEE SYAS,
11) BRITTNEY JAMES BREHM,
12) GARY DEWAYNE BROWN,
13) BRIAN MICHAEL BOWERS,
14) RYAN A. BATTAGLER,
15) JACKIE R. LOVE, JR.,
16) WILLIAM DEAN CAMPBELL,
17) JASON LEE KIRTLEY,
18) MARION EUGENE BRAMMER,
19) DARRIN GENE BERRY,
20) RODNEY EARL KING,
21) JASON DANIEL DAVIS,
22) JAY HARRISON LEE CARDER,
23) ANTHONY RAY STEVENSON,
24) PAULA RAE SCOTT,
25) BRYAN D. CARROLL,
26) CALEB DEAN HAYES,

Defendants.

Case No. 15-06004-01/26-CR-SJ-DGK

MOTION FOR DETENTION

Comes now the United States of America, by and through its undersigned counsel, and hereby moves this Court to order the detention of defendant and states the following in support of the motion:

1. This motion is being made at the defendants' first appearances before a judicial officer. A superseding indictment has been filed charging defendants with conspiracy to distribute controlled substances, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(A), (b)(1)(C), and 846.

2. This case involves an offense for which a maximum term of imprisonment of ten years or more is prescribed in the Controlled Substances Act, 21 U.S.C. §§ 801 *et seq.*, the Controlled Substances Import and Export Act, 21 U.S.C. §§ 951 *et seq*., or chapter 705 of title 46. *See* 18 U.S.C. §§ 3142(f)(1)(C).

3. Subject to rebuttal by the defendants, the Court shall presume that no condition or combination of conditions will reasonably assure the appearance of the defendants as required and the safety of the community. *See* 18 U.S.C. § 3142(e)(3).

4. Further, the United States submits that there is clear and convincing evidence that there are no conditions which the Court could place on the defendants' release which would reasonably assure the defendant's appearance in Court and the safety of the community. *See* 18 U.S.C. § 3142(g) (citing factors to consider including nature and circumstances of offense, weight of evidence, defendants' history and characteristics, and danger to any person or community). Because of this, the United States requests that a Detention Hearing be held and that the defendants be detained. *See generally United States v. Sazenski*, 806 F.2d 846, 848 (8th Cir. 1986); *United States v. Warren*, 787 F.2d 1237, 1238 (8th Cir. 1986).

WHEREFORE, based on the foregoing, the United States requests that the Court hold a Detention Hearing in accordance with 18 U.S.C. § 3142(f), and following such hearing, order the detention of the defendants.

Respectfully submitted,

Tammy Dickinson
United States Attorney

By: */s/ Bruce Rhoades*

Bruce Rhoades
Assistant United States Attorney
Narcotics & Violent Crimes Unit

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was delivered on July 13, 2015, to the CM-ECF system of the United States District Court for the Western District of Missouri, and a copy of the foregoing will be hand-delivered to defendants at their first appearance before a judicial officer.

/s/ Bruce Rhoades

Bruce Rhoades
Assistant United States Attorney

BR/lm